## **REMARKS**

The Office action has been carefully considered. The Office action rejected claims 1-2, 4-6, 9, 12, 17-19, 23-29, 32-33, 37-38, 47-48, 55-57, and 62-63 under 35 U.S.C. § 102(a) as being anticipated by Japanese Patent Publication No. 2001-325249 to Otake et al. ("Otake"). The Office action also rejected claims 49-54 under 35 U.S.C. § 102(a) as being anticipated by Secure Web Scripting (1998) by Anupam et al. ("Anupam"). Further, the Office action rejected claim 3 under 35 U.S.C. § 103(a) as being unpatentable over Otake. Further yet, the Office action rejected claim 7-8 under 35 U.S.C. § 103(a) as being unpatentable over Otake in view of U.S. Patent Publication No. 2002/0087479 to Malcolm ("Malcolm"). Still further, the Office action rejected claims 10 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Otake in view of U.S. Patent No. 6,029,245 to Scanlan et al. ("Scanlan"). The Office action rejected claims 13-16, 39-46, and 58-61 under 35 U.S.C. § 103(a) as being unpatentable over Otake in view of U.S. Patent No. 6,516,308 to Cohen et al. ("Cohen"). The Office action rejected claims 20-22, 31, and 34-36 under 35 U.S.C. § 103(a) as being unpatentable over Otake in view of Anupam. Finally, the Office action rejected claims 11 under U.S.C. § 103(a) as being unpatentable over Otake in view of Cohen and in further view of Scanlan.

In addition to the claim rejections noted above, the Office action objected to claim 42, and specific aspects of the drawings and specification that contained various informalities. Applicants have amended claim 42 and the specification to

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obviate these objections. Regarding the claim rejections, applicants respectfully disagree.

By present amendment, claims 1, 19, 26, 41-42, and 55 have been amended for clarification and not in view of the prior art. Claims 31 and 58-59 are cancelled. Applicants submit that the claims as filed were patentable over the prior art of record, and that the amendments herein are for purposes of clarifying the claims and/or for expediting allowance of the claims and not for reasons related to patentability. Reconsideration is respectfully requested.

Applicants thank the Examiner for the interview held (by telephone) on August 16, 2005. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is directed to a system and method that allows the author of the page (e.g., of Internet content) to associate a different set of security settings (typically associated with a security zone) on any desired element (e.g., tag) on an authored page. Thus, when the page is interpreted for rendering, each element is handled based on its associated security settings, whereby the settings may be used to allow, deny or otherwise handle (e.g., prompt for) an action of the element. Among other benefits, this allows a page author to request that any element that is on a page be considered differently with respect to security than

other elements, and/or differently relative to the page that contains it. Further, privacy settings may be treated like security settings, whereby privacy related issues may be distinguished between elements on a page.

According to one embodiment, a negotiator (e.g., local and rule-based) determines the actual settings for elements. Among other things, this ensures that security cannot be compromised by tagging an element such that it has the ability to do more than desired, e.g., more than is allowed for its parent container. The negotiator also determines the settings for elements that do not have specifically associated security data. For example, elements without specified security settings may inherit security settings from higher elements, or the top-level container, which may correspond to a security zone (e.g., determined via the top-level domain's URL) or another set of associated security settings.

Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

## §102 Rejections

Turning to the claims, amended claim 1 recites in a computer system, a method comprising receiving a page comprising content including one or more elements having active content and controlling page output and any actions corresponding to at least part of the content by: 1) interpreting at least one part of the page based on a first set of security settings; and 2) interpreting at least one other part of the page based on a second set of security settings associated with an element of the page, the second set of security settings being different from the first set.

The Office action rejected claim 1 as being anticipated by Otake. More specifically, the Office action cited the Abstract and "security levels of the respective constituting elements of the acquired document" of Otake. The Office action did not detail any further the nature of the rejection. Applicants respectfully disagree.

Otake is directed, generally, to a system and method for preventing specific elements in a document from being printed or displayed. More specifically, Otake teaches a method for associating a security level with various elements (e.g., a picture, a text area, a graphic logo). Then, when a particular user wishes to print or display the document containing the elements associated with various security levels, each element's security level is compared to a security level associated with the user. Based on each comparison, each element is either printed/displayed or blocked such that nothing or a "black paint" area appears where the higher security level element would have been. However, Otake is not at all aware of what the elements of each document are. Rather, Otake simply sees each element as associated with a security level and the only action that Otake may take is to print/display or not print/display.

In contrast, claim 1 recites receiving a page comprising content including one or more elements having active content. An element having active content, such as an ActiveX® control, often requires security checks as active content may be malicious and cause harm to a computer system if executed therein. Active content may be distinguished from non-active elements (e.g., a picture, a text area, a graphic logo) in that non-active elements may not be executed and typically

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cannot maliciously harm the host system. Thus, it becomes far more critical to protect a system against potential malicious active content.

Otake does not teach, or is, much less, even aware of the concept of active content. Rather, Otake simply teaches elements that may be printed or displayed. Otake is wholly unconcerned with the nature or type of element other than an associated security level, to an extent. Otake cannot possibly be construed to teach receiving a page comprising content including one or more elements having active content as recited in claim 1.

Furthermore, claim 1 recites controlling page output and any actions corresponding to at least part of the content. That is, claim 1 is directed to a method that not only controls page output (e.g., whether to display or not to display) but also actions (e.g., whether to execute active content or not). As discussed above, Otake can only decide whether to display or not to display but cannot decipher whether or not to take action or not (i.e., whether or not to execute active content). Otake simply falls short of teaching controlling page output and any actions corresponding to at least part of the content as recited in claim 1.

For at least these reasons, applicants submit that claim 1 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 2, 4-6, 9, 12, and 17-18, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 1 and consequently includes the recitations of independent claim 1. As discussed above, Otake fails to disclose the recitations of claim 1 and therefore these claims are also allowable over the prior art of record. In addition to

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the recitations of claim 1 noted above, each of these dependent claims includes additional patentable elements.

Turning to the next independent claim, amended claim 19 recites in a computer system, a method comprising authoring a page containing at least one element, associating the at least one element with at least one security zone, and associating security data with an element contained in the page based on the associated security zone.

The Office action rejected claim 19 as being anticipated by Otake. More specifically, the Office action cited drawing 2 and page 26 of Otake. The Office action did not detail any further the nature of the rejection. Applicants respectfully disagree.

As discussed above, Otake is directed, generally, to a system and method for preventing specific elements in a document from being printed or displayed. More specifically, Otake teaches a method for associating a security level with various elements (e.g., a picture, a text area, a graphic logo). Then, when a particular user wishes to print or display the document containing the elements associated with various security levels, each element's security level is compared to a security level associated with the user. Based on each comparison, each element is either printed/displayed or blocked such that nothing or a "black paint" area appears where the higher security level element would have been. However, Otake is not at all aware of what the elements of each document are much less any particular security zone that each security level and/or element may be associated. Rather, Otake simply sees each element as associated with a security level and

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nothing more and the only action that Otake may take is to print/display or not print/display.

In contrast, claim 19, as amended, recites associating the at least one element with at least one security zone. Otake does not teach the concept of a security zone. The Office action specifically acknowledges that Otake does not teach the concept of security zones as conceded in the rejection of claims 31, 58 and 59. Thus, applicants submit that claim 19 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 23-25, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 19 and consequently includes the recitations of independent claim 19. As discussed above, Otake fails to disclose the recitations of claim 19 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 19 noted above, each of these dependent claims includes additional patentable elements.

Turning to the next independent claim, amended claim 26 recites in a computer connected to a network, a system comprising browser software that interprets content received from the network, and a security mechanism that associates a first security zone with a first part of the content and associates a second security zone with a second part of the content, the security mechanism further operable to associate a first set of security settings with the first part of the content based on the first security zone, and associate a second set of security

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settings with the second part of the content based on the second security zone, the second set of security settings different from the first.

The Office action rejected claim 26 as being anticipated by Otake. More specifically, the Office action cited the Abstract and "security levels of the respective constituting elements of the acquired document" of Otake. The Office action did not detail any further the nature of the rejection. Applicants respectfully disagree.

As discussed above, Otake is not at all aware of what the elements of each document are much less any particular security zone that each security level and/or element may be associated. Rather, Otake simply sees each element as associated with a security level and nothing more and the only action that Otake may take is to print/display or not print/display.

In contrast, claim 26, as amended, recites a security mechanism that associates a first security zone with a first part of the content and associates a second security zone with a second part of the content, the security mechanism further operable to associate a first set of security settings with the first part of the content based on the first security zone, and associate a second set of security settings with the second part of the content based on the second security zone, the second set of security settings different from the first. Otake does not teach the concept of a security zone. The Office action specifically acknowledges that Otake does not teach the concept of security zones as conceded in the rejection of claims 31, 58 and 59. Thus, applicants submit that claim 26 is allowable over the prior art of record for at least the foregoing reasons.

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Applicants respectfully submit that dependent claims 27-29, 32-33, 37-38, and 47-48, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 26 and consequently includes the recitations of independent claim 26. As discussed above, Otake fails to disclose the recitations of claim 26 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 26 noted above, each of these dependent claims includes additional patentable elements.

Turning to the next independent claim, claim 49 recites a computerimplemented method, comprising providing a page associated with a first security
zone and providing an element in the page, the element being associated with a
second security zone that is different from the first security zone.

The Office action rejected claim 49 as being anticipated by Anupam. More specifically, the Office action cited pages 51-52 of Anupam. The Office action did not detail any further the nature of the rejection. Applicants respectfully disagree.

Anupam is directed, generally, to a method for providing security for scripting within web documents. More specifically, the cited and applied section of Anupam teaches a trust management system between users of different domains commonly associated with the Internet and various company intranets. Anupam implements an object property tag called "private" and it is typically associated with a context, e.g., a domain. When set to true, any object associated with this tag will not be allowed to be accessed by a user from any context other than the one associated with the private tag. Thus, if a "private" user (i.e., a user is the same

context as the object being accessed) accesses a "private" object, all scripts may be run. However, if user outside of the object context tries to access a "private" object, the no scripts will be able to run. In essence, Anupam teaches associating objects with a context and allowing or disallowing scripts based upon a requestor's context.

In contrast, claim 49 recites providing a page associated with a first security zone and providing an element in the page. That is, the entire page, as opposed to elements or objects within the page, is associated with a first security zone (which the Office action has likened to a context). Further, claim 49 recites the element being associated with a second security zone that is different from the first security zone. That is, the elements within the page are associated with a different security zone (i.e., context). Distinguishing between security zones associated with a page and elements within the page (as recited in claim 49) is quite different from distinguishing between contexts of objects and contexts of users as is taught by Anupam. Since documents always reside entirely within a specific context (i.e., the page can only be in one domain at a time), Anupam cannot possibly teach that specific objects (i.e., elements) within the document reside in another context and are subject to different security rules. Applicants submit that claim 49 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 50-54, by similar analysis, are allowable, Each of these claims depends either directly or indirectly from claim 49 and consequently includes the recitations of independent claim 49. As discussed above, Anupam fails to disclose the recitations of claim 49 and

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therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 49 noted above, each of these dependent claims includes additional patentable elements.

Turning to the last independent claim, amended claim 55 recites a markup language document, comprising a first set of content associated with a first set of security settings that is based on a first security zone and a second set of content associated with a second set of security settings that is based on a second security zone, the second set of security settings being different from the first set of security settings.

The Office action rejected claim 55 as being anticipated by Otake. More specifically, the Office action again cited the Abstract and "security levels of the respective constituting elements of the acquired document" of Otake. The Office action did not detail any further the nature of the rejection. Applicants respectfully disagree.

As discussed above, Otake is not at all aware of what the elements of each document are much less any particular security zone that each security level and/or element may be associated. Rather, Otake simply sees each element as associated with a security level and nothing more and the only action that Otake may take is to print/display or not print/display.

In contrast, claim 26, as amended, recites a first set of content associated with a first set of security settings that is based on a first security zone and a second set of content associated with a second set of security settings that is based on a second security zone. Otake does not teach the concept of a security

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zone. The Office action specifically acknowledges that Otake does not teach the concept of security zones as stated in the rejection of claims 31, 58 and 59. Thus, applicants submit that claim 55 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 56-57 and 62-63, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 55 and consequently includes the recitations of independent claim 55. As discussed above, Otake fails to disclose the recitations of claim 55 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 55 noted above, each of these dependent claims includes additional patentable elements.

## §103 Rejections

The Office action rejected several dependent claims under 35 U.S.C. § 103(a). More specifically, the Office action rejected claim 3 as being unpatentable over Otake. Further, the Office action rejected claim 7-8 as being unpatentable over Otake in view of Malcolm. Further yet, the Office action rejected claims 10 and 30 as being unpatentable over Otake in view of Scanlan. Still further, the Office action rejected claims 13-16, 39-46, and 58-61 as being unpatentable over Otake in view of Cohen. The Office action rejected claims 20-22, 31, and 34-36 as being unpatentable over Otake in view of Anupam. Finally, the Office action rejected claim 11 as being unpatentable over Otake in view of Cohen and in further view of Scanlan. Claims 31 and 58-59 have been cancelled.

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Each of these dependent claims depends from independent claims addressed previously with respect to the respective §102 rejection of the corresponding independent claims. As was argued above, the recitations of the independent claims are not taught by the respective references cited, (*i.e.*, Otake does not teach claims 1, 19, 26, and 55 and Anupam does not teach claim 49). As such, the combination of these references with other references cannot possibly be construed to teach or even suggest the recitations of the various dependent claims. Furthermore, the combination of the respective primary references with the various secondary references cited in the §103 rejections also fail to teach or even suggest the recitations of the respective rejected dependent claims cited by the Office action. Simply put, the prior art of record, whether considered as individual references or in any permissible combination with each other, still fails to teach or suggest the recitations of claims 3, 7-8, 10-11, 13-16, 20-22, 34-36, 39-46, and 60-61. Applicants submit that these claims are allowable over the prior art of record.

For at least these additional reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office action is respectfully requested and early allowance of this application is earnestly solicited.

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## CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-30, 32-57, and 60-63 are patentable over the prior art of record, and that the application is in good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,

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